

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

IN RE:	§	CASE NO. 19-20140
	§	
TOSHA YVETTE MOORE	§	
701 n Cass St	§	
Jefferson, TX 75657	§	
(xxx xx 9306)	§	
	§	
DEBTOR	§	CHAPTER 13

OBJECTION OF NORTH EAST TEXAS CREDIT UNION TO  
CONFIRMATION OF DEBTORS' CHAPTER 13 PLAN

COMES NOW North East Texas Credit Union ("Creditor") and files this Objection to Confirmation of Debtor's Amended Chapter 13 Plan and in support would show the Court as follows:

Debtor's Plan should not be confirmed in that the value, as of the effective date of the plan, of property to be distributed to the Creditor is less than the allowed amount of the Creditor's claim, contrary to the requirements of 11 U.S.C. §1325(a)(5). The value of the property which secures Creditor's claim is greater than the allowed claim. Pursuant to 11 U.S.C. §506(b), Creditor is entitled to interest on its allowed claim and reasonable fees, costs and charges provided for under the loan documents. Debtor's Amended Plan fails to provide for interest to be paid on Creditor's allowed claim and makes no provision for the reasonable fees, costs and charges which Creditor has incurred and is entitled to recover from Debtor.

WHEREFORE, Creditor prays that the Court enter an order denying confirmation of Debtor's Amended Chapter 13 Plan and for such other and further relief as is just.

Respectfully Submitted,

MCNALLY & PATRICK L.L.P

By: /s/ Glen Patrick

State Bar I.D. #15579500  
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CREDIT UNION  
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing was served either by electronic means or by regular first class mail on all parties listed below and if by regular mail, then by placing same in the care and custody of the United States Postal Service, postage prepaid, this 14th day of February, 2020.

/s/ Glen Patrick

DEBTOR  
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